

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

2015 MAY -5 P 3:42

UNITED STATES OF AMERICA,

JON W. SANFILIPPO
CLERK

Plaintiff,

vs.

15-CR-089
Case No.

BENITO MARTINEZ, a.k.a., "Benny," and
DALQUAVIS WARD, a.k.a., "DQ,"

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. At all times material to this Indictment, Colonial Liquor, located at 2813 Taylor Avenue, Racine, Wisconsin 53403, was engaged in the purchase and sale of articles and commodities in interstate commerce.

2. On or about December 14, 2014, in the State and Eastern District of Wisconsin,

**BENITO MARTINEZ, a.k.a., "Benny," and
DALQUAVIS WARD, a.k.a., "DQ,"**

did unlawfully obstruct, delay, and affect commerce by robbery in that the defendants unlawfully took and obtained U.S. currency, from and in the presence of an employee of the Colonial Liquor against his will by means of actual and threatened force, violence, and fear of injury to his person.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2014, in the State and Eastern District of Wisconsin,

**BENITO MARTINEZ, a.k.a., "Benny," and
DALQUAVIS WARD, a.k.a., "DQ,"**

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence, namely Hobbs Act Robbery, for which they may be prosecuted in a court of the United States, as charged in Count One of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:


On or about January 9, 2015, in the State and Eastern District of Wisconsin,

DALQUAVIS WARD, a.k.a., "DQ,"

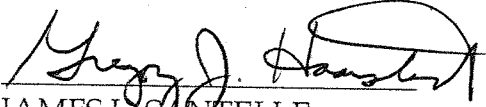
who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition which, prior to his possession of it, had been transported interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL:


FOREPERSON

Dated: 5-5-15


JAMES L. SANTELLE
United States Attorney